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Attorneys for Defendant
5 JUAN CARLOS MARTINEZ CASTRO

6
7 IN THE UNITED STATES DISTRICT COURT
8 FOR THE EASTERN DISTRICT OF CALIFORNIA

9 UNITED STATES OF AMERICA,)	Case No. 2:19-cr-233 TLN
)	
10 Plaintiff,)	STIPULATION AND PROPOSED ORDER TO
)	CONTINUE STATUS CONFERENCE, AND TO
11 vs.)	EXCLUDE TIME
)	
12 JUAN CARLOS MARTINEZ)	Date: December 9, 2021
13 CASTRO,)	Time: 9:30 a.m.
Defendant.)	Judge: Hon. Troy L. Nunley
)	
14)	

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16 IT IS HEREBY STIPULATED by and between the parties hereto through their
17 respective counsel, U.S. Attorney McGregor Scott, through Assistant United States Attorney
18 Justin Lee, attorney for Plaintiff, and Federal Defender Heather Williams, through Assistant
19 Federal Defender Hannah Labaree, attorney for defendant Juan Carlos Martinez Castro, and
20 Christopher Cosca, attorney for defendant Shannon Jeffries, that the previously-scheduled status
21 conference date of December 9, 2021, be vacated and the matter be set for status conference on
22 July 21, 2022 at 9:30 a.m, at the defendants' request.

23 The purpose of this request is to allow for continuity of counsel for Mr. Castro, as well as
24 to allow for sufficient time to review and investigate case materials, and to review discovery with
25 each respective client. Further, defense counsel for Mr. Castro will be out on extended medical
26 leave until July 2022.

27 Mr. Castro is out of custody on Pretrial Release and is in full compliance with his
28 conditions. Ms. Jeffries is in custody at the Sacramento County Jail.

1 For all these reasons, Defense counsel believe that the failure to grant the above-
2 requested continuance would deny them the reasonable time necessary for effective preparation,
3 taking into account the exercise of due diligence.

4 Based upon the foregoing, the parties agree time under the Speedy Trial Act should be
5 excluded from this order's date through and including July 21, 2022, pursuant to 18 U.S.C.
6 §3161 (h)(7)(A)and (B)(iv) (reasonable time to prepare), and General Order 479, Local Code T4,
7 based upon continuity of counsel and defense preparation.

8 Counsel and the defendant also agree that the ends of justice served by the Court granting
9 this continuance outweigh the best interests of the public and the defendant in a speedy trial.

10 Respectfully submitted,

11 Dated: December 3, 2021

HEATHER E. WILLIAMS
Federal Defender

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13 /s/ Hannah Labaree
HANNAH LABAREE
Assistant Federal Defender
Attorney for Defendant
Juan Carlos Martinez Castro

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15
16 Dated: December 3, 2021

/s/Christopher Cosca
CHRISTOPHER COSCA
Attorney for Defendant
Shannon Jeffries

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20 Dated: December 3, 2021

MCGREGOR SCOTT
United States Attorney

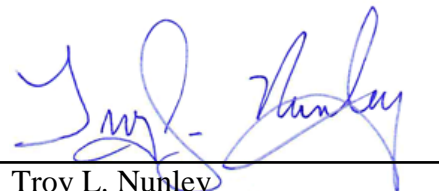
21
22 /s/Justin Lee
JUSTIN LEE
Assistant U.S. Attorney
Attorney for Plaintiff

ORDER

IT IS HEREBY ORDERED, the Court, having received, read, and considered the parties' stipulation, and good cause appearing therefore, adopts the parties' stipulation in its entirety as its Order. The Court specifically finds the failure to grant a continuance in this case would deny counsel reasonable time necessary for effective preparation, taking into account the exercise of due diligence. Further, the continuance is necessary to maintain continuity of counsel. Court finds the ends of justice are served by granting the requested continuance and outweigh the best interests of the public and defendant in a speedy trial.

The Court orders the time from the date of this order, up to and including July 21, 2022, shall be excluded from computation of time within which the trial of this case must be commenced under the Speedy Trial Act, pursuant to 18 U.S.C. § 3161(h)(7)(A) and (B)(iv) [reasonable time for counsel to prepare] and General Order 479, (Local Code T4). It is further ordered the December 9, 2021 status conference shall be continued until July 21, 2022, at 9:30 a.m.

DATED: December 3, 2021



Troy L. Nunley
United States District Judge